

August 10, 2007

B-19J

Ms. Victoria Hirshboeck
Refuge Manager
United States Department of the Interior
Fish and Wildlife Service
Trempealeau National Wildlife and Fish Refuge
W28488 Refuge Road
Trempealeau, Wisconsin 54661

**RE: Comments for Draft Environmental Impact Statement for Trempealeau
Wildlife & Fish Refuge EIS NO. 20070248**

Dear Ms. Hirschboeck:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U. S. Environmental Protection Agency (U.S. EPA), Region 5 has reviewed the Draft Environmental Impact Statement (EIS) and Comprehensive Conservation Plan (CCP) for the Trempealeau National Wildlife and Fish Refuge (Refuge). The Refuge was established by Executive Order 1936 to provide a refuge and breeding ground for migratory birds and other wildlife. The Refuge encompasses 6,226 acres of Mississippi River floodplain in western Wisconsin along the Mississippi River. The CCP will help ensure that this Refuge will contribute to fulfilling the overall mission of the Refuge system. The Draft EIS is to identify the new preferred alternative. Your agency has selected alternative C as the preferred alternative which calls for integrated public use, habitat, and wildlife focus.

Based on our review, we have rated the draft EIS as "LO". The "LO" indicates that we have a lack of objection and did not identify the need for additional information or environmental issues to be considered. However, we do offer the following comments for your consideration. These comments are on NEPA compliance and the relationship between the CCP and the Navigation Ecosystem Sustainability Program (NESP) which is led by the United States Army Corps of Engineers. We agree with the approach taken for this programmatic EIS to determine which broad thematic approach would be appropriate for the Refuge. Since the focus of a programmatic EIS is holistic, we can not agree that this document alone is suitable to provide specific project analysis to support future decisions under NEPA.

Programmatic EISs are by nature not specific, therefore we believe that additional NEPA analysis and documentation that tiers from the Programmatic EIS is appropriate when implementing a specific project. We also recommend that the Final EIS provide narrative that explains how your agency will integrate the CCP for this Refuge with the NESP.

Thank you for the opportunity to review and comment on the draft EIS and Comprehensive Conservation Plan for the Trempealeau National Wildlife and Fish Refuge. If you have any questions or comments, please contact Al Fenedick of my staff. Al can be reached at 312 886-6872 or by E-mail at Fenedick.al@epa.gov.

Sincerely,

/s/

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance